

EXHIBIT J

1
2 UNITED STATES DISTRICT COURT
3 EASTERN DISTRICT OF NEW YORK
4 INDEX NO: 1:19-cv-2987

5 - - - - - X

6 YELENA RUDERMAN,

7 Plaintiff,

8 -against-

9 LAW OFFICE OF YURIY PRAKHIN,
10 PC, and YURIY PRAKHIN, in both
11 his individual and professional
12 capacities,

13 Defendants.

14 - - - - - X

15 Virtual Deposition
16 New York, New York

October 15, 2020

17 10:25 a.m.

18
19 DEPOSITION of YURIY PRAKHIN, the
20 Defendant, by the Plaintiff, in the
21 above-entitled action, held at the above
22 time and place, pursuant to Order, via
23 Virtual Zoom, taken before Tracie Shand, a
24 shorthand reporter and Notary Public
25 within and for the State of New York.

1 Yuriy Prakhin

2 She needs to work with the cases. More
3 important part, which we agreed upon, was
4 she needs to settle cases. Because the
5 revenue of the office come from cases
6 which are settled.

7 Also, we discuss the issue that
8 all the phone calls from the clients
9 should be returned timely. Basically,
10 that was the conversation about.

11 Q. Did you tell her that she would
12 be expected to take depositions?

13 A. Yes.

14 Q. Did you tell her that she would
15 be expected to handle court appearances?

16 A. Yes.

17 Q. Did you tell her she would be
18 expected to handle mediations?

19 A. Yes.

20 Q. Did you tell her she would be
21 expected to visit her clients?

22 A. No. She is not expected to
23 visit the clients, no. That's not her
24 duty.

25 Q. Whose duty is that?

1 Yuriy Prakhin

2 Q. You looked through her payroll
3 records and you determined which days she
4 was out and which days she was out for a
5 medical reason and which days she was not?

6 A. Well, on the documents which I
7 used and Irene Raskin used it is the
8 document I just mentioned, yes.

9 Q. You mentioned, I think, you
10 called it a punching machine?

11 What is the device that the
12 attorneys use to generate this record
13 that's in front of you?

14 A. The punching machine which you
15 are submitting me right now as an Exhibit,
16 this is a machine that we use mostly for
17 paralegals, not for attorneys. But
18 attorneys use this punch-in machine as
19 well, but, however, it not reflect the
20 real hours they work.

21 For example, if the attorney
22 started day in court, it couldn't be
23 reflected in this punch-in machine.
24 Therefore, I did not rely on this
25 timesheet during my calculation.